

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0123773; AI 5118; PER2008001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. THE APPLICANT IS:** Coastal Waste Services, Inc
Hahnville Coastal Waste Services Facility
312 Howze Beach Lane
Slidell, LA 70461
- II. PREPARED BY:** Angela Marse
- DATE PREPARED:** April 23, 2008
- III. PERMIT ACTION:** LPDES permit LA0123773, AI 5118; PER2008001
- LPDES application received: January 4, 2008
- LPDES permit issued: none issued

IV. FACILITY INFORMATION:

- A. The application is for the discharge of exterior vehicle and equipment washwater from vehicle storage and maintenance facility serving Coastal Waste Services company trucks and equipment. Non-contact stormwater will sheet flow off the property to adjacent ditches. A sanitary sewer treatment system is in operation at the facility. However, the treatment system discharges to an underground leach field and no discharges from the sanitary treatment system to waters of the state occur.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located at 212 Scorpio Street in Hahnville, St. Charles Parish.

- D. Outfall 001

Discharge Location:	Latitude	29° 58' 13" North
	Longitude	90° 24' 59" West

Description: vehicle and equipment washwater and stormwater runoff

Design Capacity: 0.0003 MGD

Type of Flow Measurement which the facility is currently using: calculation based on water usage

V. RECEIVING WATERS:

The discharge is into an open ditch, thence into an open canal, thence into the Eigthy Arpent Canal in segment 020202 of the Barataria Basin. This segment is listed on the 303(d) list of impaired waterbodies.

Statement of Basis

LA0123773; AI 5118; PER2008001

Page 2

The designated uses and degree of support for Segment 020202 of the Barataria Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 020202	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Full	Full	Not Supported	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 020202 of the Barataria Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303 (d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40 CFR 130 require that each state identify those waters within its boundaries not meeting water quality standards. The Clean Water Act further requires states to implement plans to address impairments. LDEQ is developing Total Maximum Daily Loadings Studies (TMDLs) to address impaired waterbodies. Segment 020202 of the Barataria Basin is on the 2004 Integrated 303(d) List of Impaired Waterbodies. The suspected causes of impairment are non-native aquatic plants and dissolved oxygen. To date no TMDLs have been completed for this waterbody. Other control measures besides TMDLs will be used to address non-native aquatic plants. The dissolved oxygen impairment will be addressed in the permit through permit limitations for chemical oxygen demand (COD). Analytical tests for COD measure all of the oxidizable (organic and inorganic) matter in an effluent sample. This will indicate if pollutants are present that utilize oxygen in the stream making it less available for fish and other species.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 020202 of the Barataria Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 27, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

Statement of Basis

LA0123773; AI 5118; PER2008001

Page 3

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mrs. Angela Marse
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:**Final Effluent Limits:****OUTFALL 001**

A notice of intent to discharge exterior vehicle and equipment wash wastewater (under LAG750000) was submitted to LDEQ on November 8, 2007. LAG750000 does not cover washing of garbage trucks, so an individual application was submitted on January 4, 2008. (Although coverage under the LAG480000 for Light Commercial Facilities is not being granted at this time, it does not cover the washing of garbage trucks either.) Wastes transported in trucks will consist of non-hazardous solid waste. Trucks will be empty when they arrive at the facility. After washing, dispatched trucks will reduce odors and waste by-products carried onto local streets.

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg.	Daily Max.	Basis
TSS	N/A	45 mg/l	Light Commercial General Permit LAG480000, Schedule B.
COD	200 mg/l	300 mg/l	Light Commercial General Permit LAG480000, Schedule B.
Oil and Grease	N/A	15 mg/l	Light Commercial General Permit LAG480000, Schedule B.
Soaps and/or detergents ¹	N/A	N/A	Light Commercial General Permit LAG480000, Schedule B.
Visible Sheen ²	N/A	No Presence	Light Commercial General Permit LAG480000, Schedule B.

Statement of Basis

LA0123773; AI 5118; PER2008001

Page 4

- ¹ You must document in a monthly inventory record the quantity and type of any Soap and/or Detergent that you use during each calendar month. Your inventory records should contain this information for each month beginning one month after the effective date of your permit. Do not submit your inventory records to LDEQ when you submit your DMRs and do not report on your DMRs the quantity of Soap and/or Detergent used during the reporting period. A Material Safety Data Sheet (MSDS) for each material used shall be available upon the initial use of a product. The permittee must keep the inventory records, the MSDS for each Soap and/or Detergent used, and copies of the facility's DMR records on file at the permitted facility.
- ² The limitation shall be "No Visible Sheen". Visual observation shall be made once per day when discharge occurs and the presence or absence of a sheen recorded. The number of exceedances and the total number of observations shall be reported on a DMR annually.

Other Effluent Limitations:**1) pH**

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

2) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0123773: Issued: none issued

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:**A) Inspections**

This is a new facility; no inspections have been performed.

B) Compliance and/or Administrative Orders

This is a new facility; no enforcement actions have been administered against this facility.

C) DMR Review

This is a new facility; no DMRs have been submitted for this facility.

XII. ADDITIONAL INFORMATION:

In accordance with LAC 33:IX.2707.C, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

Statement of Basis

LA0123773; AI 5118; PER2008001

Page 5

- a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- b) Controls any pollutant not limited in the permit; or
- c) Requires reassessment due to change in 303(d) status of waterbody; or
- d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body. The LDEQ will be conducting TMDLs in the Barataria Basin Subsegment 020202. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the TMDL. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

STORMWATER PROVISIONS

All maintenance to vehicles is performed under roof. This will minimize the potential discharge of pollutants through stormwater runoff. Stormwater at the facility sheet flows off the parking areas into adjacent ditches. There are no designated outfalls for stormwater runoff and none were requested in the application. Exterior vehicle washing activities are performed in the south parking area only. Washwater from the south parking area is discharged via outfall 001. The facility has a Stormwater Pollution Prevention Plan (SWPPP) and will be required to maintain the SWPPP as part of the permit.

XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in this Statement of Basis.

XIV. REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Coastal Waste Services, Inc, Hahnville Coastal Waste Services Facility, January 4, 2008 .